



Advocates for Workplace Fairness

January 22, 2016

**By ECF**

The Honorable Ramon E. Reyes, Jr.  
United States Magistrate Judge  
For the Eastern District of New York  
United States Federal Courthouse  
225 Cadman Plaza East, Room N208  
Brooklyn, NY 11201

Re: Wright v. C.E.C. Entertainment, Inc., No. 14 Civ. 6110 (MKB)(RER)

Dear Judge Reyes:

We represent the Plaintiff in the above-referenced matter. Pursuant to the Court's December 15, 2015 order, we write jointly with Defendant C.E.C. Entertainment, Inc., d/b/a Chuck E. Cheese's ("CEC") to provide a status report on the parties' negotiation of a final settlement agreement and to submit a proposed schedule for Court approval of the classwide settlement.

Since the mediation on November 18, 2015, the parties have made substantial progress in finalizing the terms of the agreed-upon settlement, including exchanging several drafts of a proposed settlement agreement and meeting and conferring to resolve remaining disputes. The parties anticipate being able to conclude negotiations in the next several weeks. In order to ensure that both parties have sufficient time to review the settlement agreement with their counsel, the parties respectfully request that the Court set Friday, March 11, 2016 as the deadline for Plaintiff's motion for preliminary approval of the settlement. In the event that the Court grants the motion for preliminary approval, Plaintiff will file his motion for final approval of the settlement no later than two weeks prior to the Court-scheduled fairness hearing.

We thank the Court for its attention to these matters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Juno Turner", with a long horizontal flourish extending to the right.

Juno Turner

cc: All counsel of record (via ECF)